

From: [Brian C. Lee](#)
To: [Brian Bardwell](#)
Cc: [Jeremy Iosue](#)
Subject: Williamson v. Lorain - Supplemental Production
Attachments: [Dispatch Agreements.pdf](#)
[Response 45..pdf](#)
[Lundy, Matthew 042922.PDF](#)
[Lundy Plf Exh 2-5.PDF](#)
[Hung, Michelle 042922.PDF](#)
[Hung Plf Exh 6-9.PDF](#)
[Bardwell Brian Mar 30 2022.PDF](#)
[Bardwell - Ex 1 \(Wms v. Hung\).PDF](#)
[Joint Motion for Protective Order \(time stamped\).PDF](#)
[Protective Order Granted 05.20.2022.PDF](#)

Brian –

In supplementation to the discovery responses, please see the following:

RFP 24 and 25: The carrier is Verizon. The following is a list of numbers associated with the individuals you requested in the requests. Please send copies of the subpoenas when you issue them.

David Moore- (440) 420-2181

Matt Lundy – does not have a County issued phone

Michelle Hung- (440) 420-2183

Tom Williams- (440) 420-0332

James Cordes- (440) 522-1238

Jen Sinatra- (440) 420-0426

Tracy Lopez - (440) 822-9965

Aimee Marcil – (440) 420-2147

Michelle Smith – does not have a County issued phone

Brian Algae – (440) 328-7419

Dave Welch – does not have a County issued phone

RFP 40: See attached. These are not necessarily agreements, but communications. That is all that exists.

RFP 41: No records found

RFP 42: No records found

RFP 43: No records found – the veteran’s committee is a separate entity not under my client’s control

RFP 44: No records found – the seven districts plan was a campaign talking point as opposed to an actual thing

RFP 45 and 46: See attached “Feasibility Study”

RFP 52 and 53: See attached. Tom Williams deposition was not ordered, so there is no transcript, and further it was subject to a protective order, which is also attached.

RFPs 39 and 47 are still being looked into, and hopefully we will have something soon. The political election has thrown a significant wrench into obtaining this supplementation as well as the responses to the ROGS, which should be able to be finalized after the election is over.

Please let me know if you have problems opening any of the attachments/supplemental production.

The above supplementation and responses do not waive any of the objections previously asserted.

Brian

Brian C. Lee

EXHIBIT B



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